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Counsel for Discover Bank

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 | Ma Olivia Abad,

Case No. : 2:25-cv-00090-CDS-DJA

Plaintiff,

12 || vs.

**Joint Motion to Extend Time to Respond
to Complaint**

13 Equifax Information Services LLC;
14 Experian Information Solutions, Inc.;
15 JPMorgan Chase Bank, N.A.; Citibank,
16 N.A.; Synchrony Financial; Capital One
Bank, National Association; Bank of
America Corporation; American Express,
Inc.; and Discover Bank.

First Request

17 || Defendants.

Defendant Discover Bank’s (“Discover”) response to plaintiff Ma Olivia Abad’s complaint is due February 12, 2025. Discover has requested, and plaintiff has agreed, that Discover have up to and including March 5, 2025, to respond to plaintiff’s complaint. There is good cause for the extension because Discover was only recently retained, and the extension will provide time for the parties to discuss a potential resolution of the claims asserted against Discover without the need for further litigation.

[continued on following page]

1 This is the first request for an extension, and it is not sought for the purposes
2 of delay.

3 | BALLARD SPAHR LLP

Freedom Law Firm, LLC

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8 By: /s/ David E. Chavez
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9 | *Attorneys for defendant Discover Bank*

Counsel for plaintiff Olivia Ma Abad

ORDER

IT IS SO ORDERED:

United States Magistrate

United States Magistrate Judge

DATED: 2/13/2025

Ballard Spahr LLP
11980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

Certificate of Service

I hereby certify that on February 12, 2025, I caused a true and accurate copy of the foregoing document to be filed with the Clerk of the Court via the CM/ECF system and served upon all parties registered for electronic service in this case.

/s/ David E. Chavez
An employee of BALLARD SPAHR LLP

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